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January 25, 2012

**Filed via Electronic Comment Filing System (ECFS)**

Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW, Suite TW-A325  
Washington, D.C. 20554

Re: Docket No. 06-36  
2011 CPNI Certification for Unite Private Networks-Illinois, LLC

Dear Ms. Dortch:

Attached is the 2011 CPNI Certification submitted by Unite Private Networks LLC-Illinois, consisting of four pages.

Should you have any questions, please don't hesitate to contact me at the above address.

Sincerely,

A handwritten signature in blue ink that reads "Rachel Lipman Reiber". The signature is fluid and cursive, with the first name "Rachel" being the most prominent.

Rachel Lipman Reiber

RLR

cc: Best Copy and Printing, Inc. via [FCC@BCPIWEB.COM](mailto:FCC@BCPIWEB.COM)

**Annual 47 C.F.R. § 64.2009(e) CPNI Certification**  
**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2011  
Date Filed: January 24, 2012  
Unite Private Networks – Illinois, LLC  
Form 499 Filer ID: 14817035  
Name of Signatory: Matthew Van Hoesen  
Title of Signatory: Chief Financial Officer/General Counsel

I, Matthew Van Hoesen, certify that I am Chief Financial Officer/General Counsel of Unite Private Networks- Illinois, LLC ("UPN-Illinois"), and acting as an agent of UPN-Illinois, that I have personal knowledge that UPN-Illinois has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See* 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that UPN-Illinois is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, record keeping and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

UPN-Illinois has not taken any action against data brokers in the past year (i.e., proceedings instituted or petitions filed by a company at either state public utility commissions, the Federal Communications Commission or in court). UPN-Illinois understands that it is required to report any information that it becomes aware of with respect to the improper attempts to utilize CPNI, and has detailed the preventive measures it has taken in Exhibit B (attached).

UPN-Illinois has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

The company represents and warrants that the above certification is consistent with 47 C.F.R. §1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.



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Matthew Van Hoesen  
Chief Financial Officer/General Counsel  
Unite Private Networks-Illinois, LLC

**Exhibit A**  
**Statement in Support of Certification**

1. During 2011, Unite Private Networks – Illinois, LLC (“UPN-Illinois”) did not use or disclose CPNI for any sales or marketing related purposes or activities.
2. UPN-Illinois does not use CPNI for any purpose for which customer approval is required.
3. UPN-Illinois has nonetheless established a supervisory review process regarding approval of CPNI use for sales and marketing purposes, should such use be contemplated, which includes the establishment, prior to such use of, *inter alia*, a CPNI customer approval and notification process.
4. Attached as Exhibit B is UPN-Illinois’ Directive Regarding Use of Customer Proprietary Network Information (“the Directive”) to all employees with access to CPNI. The Directive clearly states that it is UPN-Illinois’ policy not to use CPNI for sales or marketing-related activities. The Directive addresses the Commission’s requirements regarding customer approval for marketing uses of CPNI and prohibits any marketing-related use or disclosures of CPNI. The Directive also puts employees on notice of disciplinary action for inappropriate uses of CPNI, which may include termination of employment.
5. UPN-Illinois has not used CPNI for any sales or marketing campaigns in 2011.
6. UPN-Illinois has not disclosed or permitted access to CPNI to third parties for sales or marketing-related purposes.
7. UPN-Illinois does not provide customers with telephone or online access to CPNI at this time, but has established a procedure for implementing authentication procedures should such access be contemplated.
8. UPN-Illinois has not taken any actions against data brokers in the past year.
9. UPN-Illinois did not receive any customer complaints in 2011 concerning the unauthorized use, release or disclosure of CPNI.
10. Unless otherwise noted, all statements herein cover operations during 2011.

particular marketing use of the CPNI. It shall be the responsibility of the CPNI Supervisory Review Officer to determine whether opt-in or opt-out approval is required.

Under FCC rules, Interconnected VoIP providers may use CPNI to market those services formerly known as adjunct-to-basic services without customer approval. (These include speed dialing, computer-provided directory assistance, call monitoring, call tracing, call blocking, call return, repeat dialing, call tracking, call waiting, caller I.D., call forwarding, and certain Centrex features). It is nonetheless the Company's policy that CPNI will not be used to market these services without the approval of the CPNI Supervisory Review Officer and in accordance with an Approved Plan.

Notwithstanding the foregoing, the Company understands that CPNI may be used without prior customer approval under the following circumstances: the provision of inside wiring installation, maintenance, repair services, or to protect the Company, users and other carriers from fraudulent, abusive, or unlawful use of, or subscription to, the telecommunications services.

Failure to comply with this directive will result in disciplinary action, which may include actions up to and including termination of employment.



Matthew Van Hoesen  
Chief Financial Officer/General Counsel

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